

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BMS

UNITED STATES OF AMERICA : CRIMINAL NO. 10- 519
v. : DATE FILED: August 11, 2010
ALISHEA VANN : VIOLATIONS:
: 18 U.S.C. § 371 (conspiracy to provide
: false information to a federal firearms
: licensee – 1 count)
: 18 U.S.C. § 922(a)(6) & 924(a)(2)
: (providing false information to federal
: firearms licensee -1 count)
: 18 U.S.C. § 1028A (aggravated identity
: theft – 1 count)
: 18 U.S.C. § 2 (aiding and abetting)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

The Firing Line

1. Firing Line, Inc. ("Firing Line"), located at 1532 South Front Street in Philadelphia, Pennsylvania, possessed a federal firearms license (FFL) and was authorized to deal in firearms under federal law.
2. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.

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MICHAEL E. KUPFZ, Clerk
By _____ Dep. Clerk

3. The rules and regulations governing FFL holders require that a person seeking to purchase a handgun fill out a Firearms Transaction Record, ATF Form 4473. Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. The Form 4473 requires the purchaser to answer questions about the purchase, including a question, "Are you the actual buyer of the firearm(s) listed on this form? Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person." The Form 4473 also contains a warning that falsely answering yes to that question and falsely claiming to be the actual buyer of the firearm(s) is a crime punishable as a felony.

4. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, to ensure that the person was not prohibited from purchasing a firearm.

L.C.

5. L.C. was a real person residing in Philadelphia, in the Eastern District of Pennsylvania. At no time, material to this information, did L.C. give defendant ALISHEA VANN or anyone else authorization to use her driver's license, social security card information, or any other identifying information for any reason.

The Conspiracy

6. On or about May 20, 2010, in the Eastern District of Pennsylvania, and elsewhere, defendant

ALISHEA VANN

conspired and agreed, with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly make false and fictitious statements and to furnish a false, fictitious, and misrepresented identification, intended and likely to deceive

that dealer with respect to a fact material to the lawfulness of the sale of the firearm under the provisions of Chapter 44, Title 18, United States Code, in violation of Title 18, United States Code, Section 922(a)(6).

MANNER AND MEANS

7. It was part of the conspiracy that defendant ALISHEA VANN and others known and unknown to the United States Attorney :

- a. possessed without authorization means of identification for L.C., including L.C.'s name, date of birth, and social security number;
- b. possessed a counterfeit Pennsylvania operator's license in the name of "L.C." that purported to include L.C.'s operating license number ("OLN"), address, and date of birth; and
- c. in an effort to buy a Glock Model 19 9-millimeter handgun on behalf of another person, defendant VANN misrepresented to a store employee that she was L.C., presented the store employee with the counterfeit operator's license in the name of L.C., and completed an ATF Form 4473 in which she falsely identified herself as L.C.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendant ALISHEA VANN and others known and unknown to the United States Attorney committed the following overt acts, among others, in the Eastern District of Pennsylvania:

On or about May 20, 2010:

1. Defendant ALISHEA VANN entered the Firing Line with others known and unknown to the United States Attorney and stated that she wanted to buy a Glock Model 19 9-millimeter semi-automatic handgun (the 9 mm handgun).
2. In connection with her attempted purchase of the 9 mm handgun, defendant ALISHEA VANN provided a Firing Line employee with United States currency that she had received from others known and unknown to the United States Attorney.
3. Defendant ALISHEA VANN also filled out federal and state application forms, including a Firearm Transaction Record ATF Form 4473, on which defendant VANN falsely identified herself as L.C., provided the date of birth for the real L.C., and falsely certified that she was the actual buyer of the gun.
4. Defendant ALISHEA VANN also presented a Firing Line employee with a counterfeit operator's license in the name of L.C. and the social security number of the real L.C.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT

At all times material to this information:

1. Paragraphs 1 through 5 and 7, and Overt Acts 1 through 4 of Count One of this information are re-alleged here.

2. On or about May 20, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ALISHEA VANN,

in connection with the attempted acquisition of a firearm, that is, a Glock Model 19, 9-millimeter handgun, from Firing Line, a licensed dealer of firearms, knowingly made, and aided and abetted the making of, false and fictitious written and oral statements; and furnished and exhibited, and aided and abetted the furnishing and exhibiting of, a false, fictitious, and misrepresented identification, intended and likely to deceive the Firing Line with respect to a fact material to the lawfulness of the sale of the firearm under the provisions of Chapter 44, Title 18, United States Code, in that, defendant VANN represented herself to be L.C. by providing a counterfeit Pennsylvania operator's license in the name of L.C. and a made a written statement on Firearm Transaction Record, ATF Form 4473, certifying that she was L.C. and the actual buyer of the firearm, knowing that statements were false and fictitious.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT

At all times material to this information:

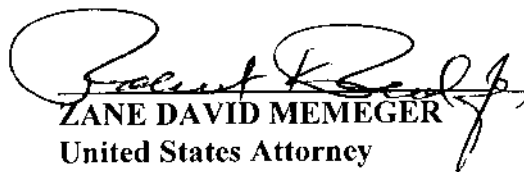
1. Paragraphs 1 through 5 and 7, and Overt Acts 1 through 4 of Count One of this information are re-alleged here.

2. On or about May 20, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ALISHEA VANN

knowingly and without lawful authority possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the counterfeit driver's license, date of birth, and social security number of L.C., during and in relation to the making of false statements in connection with the attempted acquisition of a firearm, in violation of Title 18, United States Code, Section 922(a)(6).

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(3), and 2.


ZANE DAVID MEMEGER
United States Attorney